

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA**

---

Karenza Clincy, Jammie Parker,  
Kiesha Pough, Kimberly Jordan,  
Naturee Wells, Monica Leaphart,  
and Summer Sales, Individually  
and on behalf of others similarly  
situated,

Plaintiffs,

**PLAINTIFFS' MOTION FOR  
PARTIAL SUMMARY  
JUDGMENT**

v.

Galardi South Enterprises, Inc.  
d/b/a/ The Onyx, Galardi South  
Enterprises Consulting, Inc.  
d/b/a/ The Onyx, Pony Tail, Inc.  
d/b/a/ The Onyx, Michael Kapp  
and Jack Galardi.

Defendants.

Court File No. 09-CV-2082 (RWS)

---

Now come Plaintiffs in the above-captioned matter, by Counsel, and move this Court to grant Plaintiffs' Motion for Partial Summary Judgment, holding that Plaintiffs and the other entertainers at Club Onyx are employees under the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.* This motion is made pursuant to Fed. R. Civ. P. 56.

Dated: October 14, 2010

NICHOLS KASTER, PLLP

/s/ Anna P. Prakash

Donald H. Nichols (GA Bar No. 450212)

E. Michelle Drake (GA Bar No. 229202)

Steven Andrew Smith

(MN Bar No. 260836)

*Admitted Pro Hac Vice*

Anna P. Prakash (MN Bar No. 0351362)

*Admitted Pro Hac Vice*

4600 IDS Center

80 South 8th Street

Minneapolis, MN 55402

Telephone (612) 256-3200

Fax (612) 338-4878

and

CAMPANO & SPERLING

Jennifer K. Mason (GA Bar No. 42418)

3175 Shallowford Road

Chamblee, GA 30341

Work Phone (770) 458-4477

Fax (770) 458-7663

ATTORNEYS FOR PLAINTIFFS